REMARKS

The Examiner rejected claims 1-20 under 35 U.S.C. §102(e) as allegedly being anticipated by Tong et al. (6,352,803) or Ghandehari et al. (6,589,717).

The Examiner rejected claims 1-20 under 35 U.S.C. §103(a) as allegedly being unpatentable over Tong et al. (6,352,803) or Ghandehari et al. (6,589,717).

Applicants respectfully traverse the §102(e) and §103(a) rejections.

35 U.S.C. §102(e)

The Examiner rejected claims 1-20 under 35 U.S.C. §102(e) as allegedly being anticipated by Tong et al. (6,352,803) or Ghandehari et al. (6,589,717).

Applicants respectfully contend that Tong does not teach each and every feature of claims 1, 9, and 15.

As a first example illustrating that Tong does not teach each and every feature of claims 1, 9, and 15, Tong does not teach the feature: "providing a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on a multilayer stack that is adapted to substantially reflect EUV radiation incident thereon" for (claim 1); and "a multilayer stack adapted to substantially reflect EUV radiation incident thereon; and ... a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on the multilayer stack" for claims 9 and 15. Although the Examiner has identified FIG. 2 in Tong as allegedly disclosing the features of claims 1, 9, and 15, the Examiner has not identified in FIG. 2 of Tong a first conductive layer, a buffer layer, and an absorber layer that satisfies the aforementioned feature of claims 1, 9, and 15. Applicants maintain that Tong does not disclose the aforementioned feature of claims 1, 9, and 15. Applicants respectfully request that the Examiner identify the alleged first conductive layer, a buffer layer, and an absorber layer in FIG. 2 of Tong.

As a second example illustrating that Tong does not teach each and every feature of claims 1, 9, and 15, Tong does not teach the feature: "wherein the absorber layer is adapted to absorb essentially all of EUV radiation incident thereon". Applicants point out that "essentially all of EUV radiation incident thereon" is defined in Paragraph 46 of the specification as "absorption of at least about 99% of the energy of said EUV radiation incident thereon".

Paragraph 46 of the specification also states that absorbing essentially all of EUV radiation incident thereon is accomplished through the combination of absorber material and absorber layer thickness. Applicants maintain that Tong most certainly does not disclose that the absorber layer 14 in FIG. 2 of Tong is adapted to absorb essentially all of EUV radiation incident thereon.

Applicants respectfully contend that Ghandehari does not teach each and every feature of claims 1, 9, and 15.

As a first example illustrating that Ghandehari does not teach each and every feature of claims 1, 9, and 15, Ghandehari does not teach the feature: "providing a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on a multilayer stack that is adapted to substantially reflect EUV radiation incident thereon" for (claim 1); and "a multilayer stack adapted to substantially reflect EUV radiation incident thereon; and ... a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on the multilayer stack" for claims 9 and 15. Although the Examiner has identified FIG. 3 in Ghandehari Tong as allegedly disclosing the features of claims 1, 9, and 15, the Examiner has not identified in FIG. 3 of Ghandehari a first conductive layer, a buffer layer, and an absorber layer that satisfies the aforementioned feature of claims 1, 9, and 15. Applicants maintain that Ghandehari does not disclose the aforementioned feature of claims 1, 9, and 15. Applicants respectfully request that the Examiner identify the alleged first conductive layer, a buffer layer, and an absorber layer in FIG. 3 of Ghandehari.

As a second example illustrating that Ghandehari does not teach each and every feature of claims 1, 9, and 15, Ghandehari does not teach the feature: "wherein the absorber layer is adapted

to absorb essentially all of EUV radiation incident thereon". Applicants point out that "essentially all of EUV radiation incident thereon" is defined in Paragraph 46 of the specification as "absorption of at least about 99% of the energy of said EUV radiation incident thereon". Paragraph 46 of the specification also states that absorbing essentially all of EUV radiation incident thereon is accomplished through the combination of absorber material and absorber layer thickness. Applicants maintain that Ghandehari most certainly does not disclose in FIG. 3 an absorber layer that is adapted to absorb essentially all of EUV radiation incident thereon.

Based on the preceding arguments, Applicants respectfully maintain that neither Fong nor Ghandehari anticipates claims 1, 9, and 15, and that claims 1, 9, and 15 are in condition for allowance. Since claims 2-8 depend from claim 1, Applicants contend that claims 2-8 are likewise in condition for allowance. Since claims 10-14 depend from claim 9, Applicants contend that claims 10-14 are likewise in condition for allowance. Since claims 16-20 depend from claim 15, Applicants contend that claims 16-20 are likewise in condition for allowance.

35 U.S.C. §103(a)

The Examiner rejected claims 1-20 under 35 U.S.C. §103(a) as allegedly being unpatentable over Tong et al. (6,352,803) or Ghandehari et al. (6,589,717).

Applicants respectfully contend that Tong does not teach or suggest each and every feature of claims 1, 9, and 15.

As a first example illustrating that Tong does not teach or suggest each and every feature of claims 1, 9, and 15, Tong does not teach or suggest the feature: "providing a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on a multilayer stack that is adapted to substantially reflect EUV radiation incident thereon" for (claim 1); and "a multilayer stack adapted to substantially reflect EUV radiation incident thereon; and ... a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on the multilayer stack" for claims 9 and 15. Although the Examiner has identified FIG. 2 in Tong as allegedly disclosing the features of claims 1, 9, and 15, the Examiner has not identified in FIG. 2 of Tong a first conductive layer, a buffer layer, and an absorber layer that satisfies the aforementioned feature of claims 1, 9, and 15. Applicants maintain that Tong does not disclose the aforementioned feature of claims 1, 9, and 15.

As a second example illustrating that Tong does not teach or suggest each and every feature of claims 1, 9, and 15, Tong does not teach or suggest the feature: "wherein the absorber layer is adapted to absorb essentially all of EUV radiation incident thereon". Applicants point out that "essentially all of EUV radiation incident thereon" is defined in Paragraph 46 of the specification as "absorption of at least about 99% of the energy of said EUV radiation incident thereon". Paragraph 46 of the specification also states that absorbing essentially all of EUV

radiation incident thereon is accomplished through the combination of absorber material and absorber layer thickness. Applicants maintain that Tong most certainly does not disclose that the absorber layer 14 in FIG. 2 of Tong is adapted to absorb essentially all of EUV radiation incident thereon.

Applicants respectfully contend that Ghandehari does not teach or suggest each and every feature of claims 1, 9, and 15.

As a first example illustrating that Ghandehari does not teach each and every feature of claims 1, 9, and 15, Ghandehari does not teach or suggest the feature: "providing a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on a multilayer stack that is adapted to substantially reflect EUV radiation incident thereon" for (claim 1); and "a multilayer stack adapted to substantially reflect EUV radiation incident thereon; and ... a first conductive layer between a buffer layer and an absorber layer such that the buffer layer is on the multilayer stack" for claims 9 and 15. Although the Examiner has identified FIG. 3 in Ghandehari as allegedly disclosing the features of claims 1, 9, and 15, the Examiner has not identified in FIG. 3 of Ghandehari a first conductive layer, a buffer layer, and an absorber layer that satisfies the aforementioned feature of claims 1, 9, and 15. Applicants maintain that Ghandehari does not disclose the aforementioned feature of claims 1, 9, and 15.

As a second example illustrating that Ghandehari does not teach or suggest each and every feature of claims 1, 9, and 15, Ghandehari does not teach or suggest the feature: "wherein the absorber layer is adapted to absorb essentially all of EUV radiation incident thereon". Applicants point out that "essentially all of EUV radiation incident thereon" is defined in

Paragraph 46 of the specification as "absorption of at least about 99% of the energy of said EUV radiation incident thereon". Paragraph 46 of the specification also states that absorbing essentially all of EUV radiation incident thereon is accomplished through the combination of absorber material and absorber layer thickness. Applicants maintain that Ghandehari most certainly does not disclose in FIG. 3 an absorber layer that is adapted to absorb essentially all of EUV radiation incident thereon.

Based on the preceding arguments, Applicants respectfully maintain that claims 1, 9, and 15 are not unpatentable over Tong or Ghandehari, and that claims 1, 9, and 15 are in condition for allowance. Since claims 2-8 depend from claim 1, Applicants contend that claims 2-8 are likewise in condition for allowance. Since claims 10-14 depend from claim 9, Applicants contend that claims 10-14 are likewise in condition for allowance. Since claims 16-20 depend from claim 15, Applicants contend that claims 16-20 are likewise in condition for allowance.

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below.

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